

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

VIA ECF

November 20, 2023

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs with claims against Al Rajhi Bank (“ARB”) write, along with ARB, to respectfully request the Court’s approval of a revised schedule for completion of expert discovery and the filing of Plaintiffs’ jurisdictional averment. The overall impact on the existing schedule resulting from the parties’ proposal is less than thirty days.

By way of background, the parties encountered a number of scheduling conflicts as they were working to find dates for all of the expert depositions in advance of the current December 20, 2023 deadline. In light of those conflicts, the parties conferred in good faith and jointly request the Court’s approval of the revised schedule set forth below.

- Al Rajhi Bank’s expert disclosures and rebuttal reports to be served by December 22, 2023;
- Expert depositions to be completed by January 31, 2024, or a date soon thereafter, if necessary, by agreement of the parties; and
- Plaintiffs’ jurisdictional averment to be filed by February 14, 2024, or the date two weeks following any expert deposition held after January 31, 2024 by agreement of the parties.

Plaintiffs and ARB thank Your Honor in advance for the Court’s consideration of this proposal.

Honorable Sarah Netburn

November 20, 2023

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Respectfully submitted,

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*On behalf of the Plaintiffs' Executive
Committees*

cc: All MDL Counsel of Record